

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States Courts
Southern District of Texas
FILED

March 07, 2025

Nathan Ochsner, Clerk of Court

United States of America
v.

Case No.

4:25-mj-126

Michael SEERY

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 3/06/2025 in the county of Harris in the
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

18 USC 922(g)(1)

Felon in Possession of a Firearm

This criminal complaint is based on these facts:

See attached affidavit

☒ Continued on the attached sheet.

Complainant's signature

Patrick Lewis, Special Agent, FBI

Printed name and title

Sworn to and signed by telephone.

Date: March 07, 2025

Judge's signature

City and state: Houston, Texas

Yvonne Y. Ho, U.S. Magistrate Judge

Printed name and title

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Patrick Lewis, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been since 2019. I have conducted and assisted in investigations pertaining to violent crime, organized crime, and gangs. I am currently assigned to the FBI Violent Criminal Squad whose focus is on complex criminal investigations targeting violent crime. Based on both my training and my participation in prior investigations into complex criminal organizations, I am familiar with the patterns of criminal activity and criminal enterprises that engage in crimes such as kidnapping for ransom, bribery, sex trafficking, fraud, murder-for-hire, firearms offenses, and distribution of narcotics in furtherance of a criminal enterprise.

2. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested arrest warrants and does not set forth all of my knowledge about this matter.

STATUTORY AUTHORITY

3. Based on the facts set forth in this affidavit, there is probable cause to believe that the defendant has violated Title 18, United States Code, Section 922(g)(1) (Possession of Firearm After a Felony Conviction). This is a summary of the basic facts and not a complete description of all the information in the case.

PROBABLE CAUSE

4. On March 5, 2025, U.S. Magistrate Judge Yvonne Ho signed search warrants authorizing the search for two addresses associated with Michael **SEERY** (hereafter **SEERY**).

5. On March 6, 2025, the FBI executed the two search warrants at 902 East Ave., Katy, TX 77493 and 22611 Castillo Lakes Dr., Katy, TX 77449. At approximately 6:00 AM, the FBI Houston SWAT Team surrounded the address of 22611 Castillo Lakes Dr., Katy, TX 77449, announced the presence of law enforcement, and called for the persons inside the residence to come out. Michael **SEERY**, **SARAH** Seery (wife of **SEERY**, hereafter **SARAH**), and their three children were called out of the residence. The scene was secured as safe, and a search of the residence commenced. During the search of 22611 Castillo Lakes Dr., Katy, TX 77449, 18 firearms of various makes/models were seized from the residence.

6. During the search, **SARAH** consented to being interviewed. **SARAH** said **SEERY** had someone bring 20-30 guns from 902 East Avenue to the home on Castello Lakes Drive while they were out of town between February 14 to February 18. **SARAH** told **SEERY** the guns could not stay at the house, so on or about February 28, **SEERY** rented a storage unit, and on March 1, 2025, **SEERY** took the guns to the storage unit. **SARAH** said she purchased the guns located at the two houses and the storage facility at the direction of **SEERY**. **SARAH** considered two of the firearms to be her personal weapons and the rest were purchased for **SEERY**. **SARAH** said **SEERY** purchased some of the firearms online and then directed her to pick up the firearm and complete the Federal Firearms Licensing (FFL) paperwork.

7. On March 6, 2025, U.S. Magistrate Judge Yvonne Ho signed search warrants authorizing the search for “Public Storage”, unit #1278, address: 21831 Clay Rd., Katy, TX 77449. During the search of the storage unit, 34 firearms of various makes/models were seized.

8. No individuals were located inside 902 East Ave., Katy, TX 77493, one (1) firearm and a 3D printer containing firearm accessory codes were seized from the residence/business.

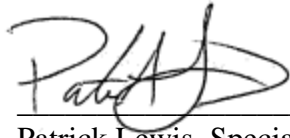
9. Among the firearms recovered were a Glock-19, several Beretta firearms, and a Kimber Ultra, none of which are manufactured in the State of Texas.

10. On March 6, 2025, **SEERY** was interviewed following advisement of the Miranda warning. During the interview, **SEERY** said he directed **SARAH** to purchase the firearms seized from the three search locations. **SEERY** purchased some of the firearms online and directed **SARAH** to pick up the orders and complete the FFL paperwork. **SEERY** said he and **SARAH** inventoried the firearms originally moved from 902 East Avenue to the home on Castello Lakes Drive and then **SEERY** moved the firearms to the storage unit on or about March 1, 2025. Video surveillance footage from the storage facility showed on March 1, 2025, at 4:16 pm, **SEERY** moving several large duffle style bags into the storage unit. **SEERY** admitted to possessing a 3D printing machine with auto sear switch and firearm suppressor codes contained within the machine. **SEERY** acknowledged he was not legally allowed to possess firearms.

11. Based on my review of law enforcement and court databases and my personal involvement with the investigation, I know on or about October 4, 2012, **SEERY**, the defendant, was convicted of 21 U.S.C. § 841(a)(1) and (b)(1)(A) (Possession with intent to distribute more than 1000 marijuana plants) in the Southern District of Texas (4:11-cr-00598), which is a felony conviction punishable by imprisonment for a term exceeding one year. **SEERY** was sentenced to 24 months in the United States Bureau of Prisons and 5 years supervised release.

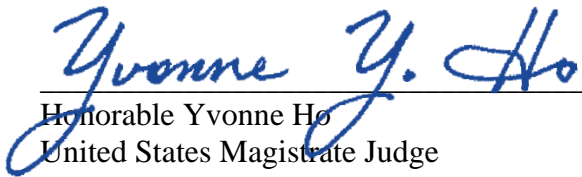
12. Based on the foregoing your Affiant believes that probable cause exists to establish that Michael **SEERY**, knowing he was a convicted felon, possessed firearms in violation of 18

U.S.C. § 922(g)(1).

A handwritten signature in black ink, appearing to read "Patrick Lewis", written over a horizontal line.

Patrick Lewis, Special Agent
Federal Bureau of Investigation (FBI)

Sworn to and subscribed before me by telephone on this the 7th day of March 2025, and I find probable cause.

A handwritten signature in blue ink, appearing to read "Yvonne Y. Ho", written over a horizontal line.

Honorable Yvonne Ho
United States Magistrate Judge